

January 25, 2022

Honorable Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York -
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Winward Bora v Karrim Mohamed*
21-cv-03736-RA
United States District Court, Southern District of New York
Post-Submission Request For Oral Argument

Dear Your Honor:

This office represents Defendant Karrim Mohamed in this matter.

Presently, Your Honor has a fully briefed motion pending wherein Plaintiff seeks a default judgment. The motion is comprised of the following documents:

[ECF Doc 30](#): Plaintiff's Initial Moving Papers;
[ECF Doc 33](#): Defendant's Opposition Papers;
[ECF Doc 40](#): Plaintiff's "Reply" Papers

Mr. Mohamed is aware of Your Honor's Court Rules, including Rule 4.G. which sets the time to request oral argument to be contemporaneous with the time Mr. Mohamed's opposition papers were filed. However, upon reading Plaintiff's "Reply," it appears that Plaintiff only seeks to oppose a phantom cross-motion rather than address the issues raised in Mr. Mohamed's opposition papers.

At the time the opposition papers were filed, Mr. Mohamed believed his documents speak for themselves; however, upon reading the Plaintiff's Reply papers, it appears that clarification may be necessary. To this end, Mr. Mohamed requests leave to extend his time to request oral argument and, should the court be so inclined, Mr. Mohamed further requests this correspondence to be such request.

For Mr. Mohamed, I thank you for your time and attention and I await your response.

Regards,



Steven Alexander Biolsi

Cc: ECF filing / PACER
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